

**Attachment 1 - Civil Complaint****UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

Genavie Melissa Hajyounes

Plaintiff(s)

THE TEXAS DEPARTMENT OF FAMILY  
AND PROTECTIVE SERVICES  
ELIZABETH SCHWARTS, TRYA PERKINS  
SHANNON DAVIS, NANCY STAIT, SHANTAVIA  
MONROE, CASA, NIKKI DARTER, COLIN  
GAFFNEY, RACHEL BUTLER

Defendant(s)

**1:20CV943-LY**

(Supplied by Clerk's Office)

**COMPLAINT**

Genavie Hajyounes - C/O 9901 Brodie Lane Suite #160-757 Austin, Texas, [78748]

VS

THE TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES/ ELIZABETH SCHWARTS, TRYA PERKINS  
SHANNON DAVIS, NANCY STAIT, SHANTAVIA MONROE, CASA, NIKKI DARTER, COLIN GAFFNEY, RACHEL  
BUTLER 1340 Airport Commerce Dr Suite 525 Austin, Texas 78741

Lack of Jurisdiction THE TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES

INDEPENDENT CORPORATION - D-U-N-S number 005381403

FALSE ALLEGATIONS, CONSPIRACY, HARRASSMENT, THREATS/ CIVIL RIGHTS VIOLATIONS, CONSTITUTIONAL  
RIGHTS VIOLATIONS, PERJURYVIOLATION OF OATH OF OFFICE - \$250,000.00- 18 USC 3571 28 USC 3002 (15)  
DENIED RIGHT OF REASONABLE DEFENSE ARGUMENTS - \$250,000.00 18 USC 3571  
DENIED RIGHT TO TRUTH IN EVIDENCE- \$200,000.00  
SLAVERY ( Forced Compliance to contracts) - \$250,000.00 18 UCS 3571  
DEPRIVATION OF RIGHTS UNDER COLOR OF LAW \$200,000.00 18 USC 242  
EMOTIONAL DISTRESS - \$200,000.00 32 CFR 536.77 (a)(3)(vii)  
MENTAL ANGUISH ABUSE \$200,000.00 42 CFR 488.301  
PEONAGE (FELONY) \$200,000.00 18-USC 1581, 42 USC 1994  
DEFAMATION OF CHARACTOR \$200,000.00  
ACTING AS AGENTS OF FOREIGN PRINCIPLES \$200,000.00 18 USC 219  
VIOLATIONS OF THE UNIVERSAL DECLARATION OF HUMAN RIGHTS \$200,000.00  
FALSIFICATION OF DOCUMENTS/RECORD - \$10,000.00 - 18 USC 1001, 26 USC 7701(a)(1)

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